

**EXHIBIT A**

**Proposed Order**

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

Ref. No. \_\_

**ORDER SUSTAINING DEBTORS' FIFTY-SEVENTH (NON-SUBSTANTIVE)  
OMNIBUS OBJECTION TO CERTAIN NO LIABILITY  
PROOFS OF CLAIM (CUSTOMER AND NON-CUSTOMER CLAIMS)**

Upon the fifty-seventh omnibus objection (the “Objection”)<sup>2</sup> of FTX Trading Ltd. and its affiliated debtors and debtors-in-possession (collectively, the “Debtors”) for entry of an order (this “Order”) sustaining the Objection and disallowing and expunging in their entirety the No Liability Claims set forth in Schedule 1, Schedule 2 and Schedule 3 attached hereto, and this Court having jurisdiction to consider the Objection pursuant to 28 U.S.C. §§ 157 and 1334 and the *Amended Standing Order of Reference* from the United States District Court for the District of Delaware, dated February 29, 2012; and this Court being able to issue a final order consistent with Article III of the United States Constitution; and venue of these Chapter 11 Cases and the Objection in this district being proper pursuant to 28 U.S.C. §§ 1408 and 1409; and this matter being a core proceeding pursuant to 28 U.S.C. § 157(b); and this Court having found that proper and adequate notice of the Objection and the relief requested therein has been provided in

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<sup>1</sup> The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>. The principal place of business of Debtor Emergent Fidelity Technologies Ltd is Unit 3B, Bryson’s Commercial Complex, Friars Hill Road, St. John’s, Antigua and Barbuda.

<sup>2</sup> Capitalized terms not otherwise defined herein are to be given the meanings ascribed to them in the Objection.

accordance with the Bankruptcy Rules and the Local Rules, and that, except as otherwise ordered herein, no other or further notice is necessary; and responses (if any) to the Objection having been withdrawn, resolved or overruled on the merits; and a hearing having been held to consider the relief requested in the Objection and upon the record of the hearing and all of the proceedings had before this Court; and this Court having found and determined that the relief set forth in this Order is in the best interests of the Debtors and their estates; and that the legal and factual bases set forth in the Objection establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor;

IT IS HEREBY ORDERED THAT:

1. The Objection is SUSTAINED as set forth herein.
2. Each No Liability Claim set forth in Schedule 1, Schedule 2 and Schedule 3 attached hereto is disallowed and expunged in its entirety.
3. This Order has no res judicata, estoppel, or other effect on the validity, allowance, or disallowance of, and all rights to object to or defend on any basis are expressly reserved with respect to any No Liability Claim referenced or identified in the Objection that is not listed on Schedule 1, Schedule 2 and Schedule 3 attached hereto.
4. Should one or more of the grounds of objection stated in the Objection be dismissed, the Debtors' right to object on any other grounds that the Debtors discover are preserved.
5. To the extent a response is filed regarding any No Liability Claim, each such No Liability Claim, and the Objection as it pertains to such No Liability Claim, will

constitute a separate contested matter as contemplated by Bankruptcy Rule 9014. This Order will be deemed a separate order with respect to each No Liability Claim. Any stay of this Order pending appeal by any claimants whose claims are subject to this Order shall only apply to the contested matter which involves such claimant and shall not act to stay the applicability and/or finality of this Order with respect to the other contested matters listed in the Objection or this Order.

6. The Debtors are authorized and empowered to execute and deliver such documents, and to take and perform all actions necessary to implement and effectuate the relief granted in this Order.

7. Nothing in this Order or the Objection is intended or shall be construed as a waiver of any of the rights the Debtors may have to enforce rights of setoff against the claimants.

8. Nothing in the Objection or this Order, nor any actions or payments made by the Debtors pursuant to this Order, shall be construed as: (a) an admission as to the amount of, basis for, or validity of any claim against the Debtors under the Bankruptcy Code or other applicable non-bankruptcy law; (b) a waiver of the Debtors' or any other party-in-interest's right to dispute any claim; (c) a promise or requirement to pay any particular claim; (d) an implication or admission that any particular claim is of a type specified or defined in this Order; (e) an admission as to the validity, priority, enforceability, or perfection of any lien on, security interest in, or other encumbrance on property of the Debtors' estates; or (f) a waiver of any claims or

causes of action which may exist against any entity under the Bankruptcy Code or any other applicable law.

9. This Order is immediately effective and enforceable, notwithstanding the possible applicability of Bankruptcy Rule 6004(h) or otherwise.

10. This Court shall retain jurisdiction with respect to any matters, claims, rights or disputes arising from or related to the Objection or the implementation of this Order.

Dated: \_\_\_\_\_  
Wilmington, Delaware

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The Honorable John T. Dorsey  
United States Bankruptcy Judge

**SCHEDULE 1**

**No Liability Claims**

**FTX Trading Ltd. 22-11068 (JTD)**  
**Fifty-Seventh Omnibus Claims Objection**  
**Schedule 1 - No Liability Claims**

				<u>Asserted Claims</u>
Claim Number	Name	Debtor	Tickers	Ticker Quantity
80075	Name on file	FTX Trading Ltd.	BTC	310,000.0000000000000000
			USD	310,000.0000000000000000

Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.

51767	Name on file	FTX Trading Ltd.	USD	200,000.0000000000000000
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Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.

54828	Name on file	FTX Trading Ltd.	USD	147,649.0000000000000000
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Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.

94541	Name on file	FTX Japan K.K.	AAVE	20,000.0000000000000000
			ADABULL	10,000.0000000000000000
			APE	20,000.0000000000000000
			ATLAS	25,000.0000000000000000
			ATOM	5,000.0000000000000000
			AUD	10,000.0000000000000000
			AVAX	3,000.0000000000000000
			BAO	100,000.0000000000000000
			BAT	2,000.0000000000000000
			BCH	25,000.0000000000000000
			BNB	10,000.0000000000000000
			BRL	25,000.0000000000000000
			BTC	120.0000000000000000
			BULL	150.0000000000000000
			CAD	5,000.0000000000000000
			CHF	10,000.0000000000000000
			DOGE	10,000.0000000000000000
			DOGEBULL	20,000.0000000000000000
			ETH	1,000,000.0000000000000000
			ETHBULL	1,000,000.0000000000000000
			EUR	1,000,000.0000000000000000
			GBP	5,000.0000000000000000
			HKD	50,000.0000000000000000

Asserted Claims				
Claim Number	Name	Debtor	Tickers	Ticker Quantity
			JPY	50,000.0000000000000000
			LINK	12,000.0000000000000000
			MANA	12,000.0000000000000000
			SGD	10,000.0000000000000000
			USD	100,000.0000000000000000
			XRPBULL	100,000.0000000000000000

Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.

50757	Name on file	FTX Trading Ltd.	USD	125,000.0000000000000000
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Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.

6994	Name on file	FTX Trading Ltd.	USD	1,480,000.0000000000000000
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Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.

80123	Name on file	West Realm Shires Services Inc.	USD	1,480,000.0000000000000000
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Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.

327	Name on file	FTX Trading Ltd.	USD	1,500.0000000000000000
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Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.

80027	Name on file	FTX Trading Ltd.	USD	2,000,000.0000000000000000
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Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.

34627	Name on file	FTX Trading Ltd.		Undetermined*
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Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. The claimant has provided no facts in the claim to demonstrate Debtors' alleged liability for profits from NFT sales. The claim fails to show any contractual obligation between a Debtor entity and the claimant. Further, the claimant has made no allegations regarding which, if any NFTs were sold, when such sales would have occurred, or why it should be entitled to the hypothetical profits from such sale. The claim does not satisfy the claimant's burden of alleging facts sufficient to demonstrate Debtors' liability on the claim, so the claim should be disallowed. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.



Asserted Claims				
Claim Number	Name	Debtor	Tickers	Ticker Quantity
5906	Name on file	FTX Trading Ltd.	USD	500,000.0000000000000000
Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.				
85204	Name on file	West Realm Shires Services Inc.	USD	500,000.0000000000000000
Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.				
94855	Name on file	West Realm Shires Services Inc.	AUD	1,000,000.0000000000000000
			EUR	1,000,000.0000000000000000
			GBP	1,000,000.0000000000000000
			USD	1,000,000.0000000000000000
Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.				
94507	Name on file	FTX Trading Ltd.	BTC	3,850.0000000000000000
			BULL	1,240.0000000000000000
			ETH	4,560.0000000000000000
			LTC	763.0000000000000000
			USD	3,400.0000000000000000
Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.				
83997	Name on file	FTX Trading Ltd.	BTC	9,257,250.6800000000000000
			ETH	308,667.5600000000000000
			WBTC	3,372,982.7800000000000000
Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.				
46391	Name on file	West Realm Shires Services Inc.	BTC	218.2579000000000000
Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.				
34454	Name on file	West Realm Shires Services Inc.	BTC	218.2579000000000000
Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.				
34432	Name on file	West Realm Shires Services Inc.	BTC	214.0000000000000000

Asserted Claims				
Claim Number	Name	Debtor	Tickers	Ticker Quantity
Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.				
51124	Name on file	FTX Trading Ltd.	USD	160,000.0000000000000000
Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.				
7077	Name on file	FTX Trading Ltd.	USD	500,000.0000000000000000
Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.				
85246	Name on file	West Realm Shires Services Inc.	USD	500,000.0000000000000000
Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.				
94815	Name on file	FTX Trading Ltd.	USD	503,000.0000000000000000
			USDT	503,000.0000000000000000
Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.				
94523	Name on file	FTX Trading Ltd.	BNB	1,200.0000000000000000
			BTC	1,000.0000000000000000
			BULL	1,100.0000000000000000
			DOGE	1,000.0000000000000000
			FTT	1,550.0000000000000000
			USD	1,400.0000000000000000
			USDT	1,500.0000000000000000
Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.				

**SCHEDULE 2**

**No Liability Claims**

**FTX Trading Ltd. 22-11068 (JTD)**  
**Fifty-Seventh Omnibus Claims Objection**  
**Schedule 2 - No Liability Claims**

			<u>Asserted Claims</u>	
Claim Number	Name	Debtor	Tickers	Ticker Quantity
45779	Name on file	Quoine Pte Ltd	EUR	10,000,000,000.0000000000000000
			GBP	12,000,000,000.0000000000000000
			JPY	120,000,000,000,000.0000000000000000
			Other Activity Asserted: Empty your red room bank accounts., fellow clones. - The just of a 250 year conviction and a recession of house arrest.	
Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. No liability exists on account of the other activity asserted. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.				
88420	Name on file	West Realm Shires Services Inc.	USD	19,000,000.0000000000000000
			Other Activity Asserted: 19000000+ - FTX was proof of work.. holding for webull.com	
Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. No liability exists on account of the other activity asserted. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.				
25335	Name on file	FTX Trading Ltd.	USD	250,000.0000000000000000
			Other Activity Asserted: Approximately \$250,000 (depending upon valuation) - Balance of FTT tokens due from purchase of Blockfolio	
Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. No liability exists on account of the other activity asserted. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.				

**SCHEDULE 3**

**No Liability Claims**

**FTX Trading Ltd. 22-11068 (JTD)**  
**Fifty-Seventh Omnibus Claims Objection**  
**Schedule 3 - No Liability Claims**

<u>Asserted Claims</u>			
Claim Number	Name	Debtor	Filed Amount
1986	ImpactVest LTD	FTX Trading Ltd.	\$1,500,000.00

Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. The claimant has provided no facts in the claim to demonstrate Debtors' alleged liability for profits from NFT sales. The claim fails to show any contractual obligation between a Debtor entity and the claimant. Further, the claimant has made no allegations regarding which, if any NFTs were sold, when such sales would have occurred, or why it should be entitled to the hypothetical profits from such sale. The claim does not satisfy the claimant's burden of alleging facts sufficient to demonstrate Debtors' liability on the claim, so the claim should be disallowed. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.

5590	Leslie, Latoya	FTX Digital Assets LLC	\$2,500,000.00
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Reason: Based on the Debtors' and their advisors' ongoing analysis and review, the Debtors and their advisors have determined that claim 5590 is not reflected in the Debtors' books and records. There are no details on the face of claim 5590 that explain the conduct or activity giving rise to a claim against the Debtors, nor that substantiate the amount of the claim asserted. In addition, it appears that the claimant did not have an FTX account. Therefore, claim 5590 should be disallowed and expunged in its entirety.

5680	Leslie, Latoya	FTX Trading Ltd.	\$8,000,000.00
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Reason: Based on the Debtors' and their advisors' ongoing analysis and review, the Debtors and their advisors have determined that claim 5680 is not reflected in the Debtors' books and records. There are no details on the face of claim 5680 that explain the conduct or activity giving rise to a claim against the Debtors, nor that substantiate the amount of the claim asserted. In addition, it appears that the claimant did not have an FTX account. Therefore, claim 5680 should be disallowed and expunged in its entirety.